07:59 PM, 27 Jul, 2025 U.S.D.C., Eastern District of New York UNITED STATES DISTRICT COURT EASTER DISTRICT OF NEW YORK

Judicial District: Eastern District of New York

Civil Action No: 1:23-cv-07719-NRM-CLP

Case Type: Civil

Plaintiff(s):

Maia Katsitadza, on behalf of herself and others similarly situated in the proposed FLSA Collective Action

Defendant:

Zsuzsanna Tiringer (a.k.a. Susan Tiringer)

ANSWER

The Defendant states the following as her Answer to Plaintiff's Interrogatories:

- 1. I do not have any information on employees hired by M&S Café. I was only an employee like everyone else. I did not have the authority to hire or fire employees. I do remember a few names who worked with me at the time, such as Nathasa, Lana, Maia, Steve (supervisor). However, I do not have any of their phone numbers, email or any other personal information. As an employee my duty was to maintain the employees' hours worked only.
- 2. A, I did not hire the Plaintiff, so therefore I had no information on her hiring date. I remember that she had a full-time job and due to her schedule, she was only able to work on the weekends. I do not remember her exact hourly schedule. I do not have any knowledge of her hourly wages. B, I did not determine wages and compensation for employees, so I never had information on any of the employees' wages.
- 3. My duty covered only schedule shifts for employees and weekly writing their first name and number of days worked on an empty envelope. I did not have the authority to fill the envelope with money or distribute their earnings.

- 4. I had no such authority. Michael Agola and Steve (supervisor) had the authority to change schedule. There was a board on the wall with a weekly schedule. If either of them did not like the schedule, they made the changes.
- 5. N/A, I have no such information.
- 6. N/A, I have no such information.
- 7. I answered all questions to my best of knowledge.
- 8. A, Steve was the only supervisor I know of. As I mentioned it, I have no personal information or full name. B, any of the employees I mentioned in question #1 worked with the Plaintiff. I do not remember their exact schedule.
- 9. A Michael Agola, B Michael Agola, C I had to make the schedule and Michael Agola needed approved it. D I have no information on that, it was the company accountant responsibility E My duty was to collect employees' time worked, F -N/A I have no information on that, it was the company accountant responsibility. G I have no information on that, it was the company accountant responsibility, H-Michael Agola and Steve.
- 10. I have no such information. I'm no longer employed by M&S Café since October 2023.
- 11. I have no such knowledge, authority or responsibility. I never held capacity as an owner, officer and/or agent of M&S Café Inc.
- 12. I have no such knowledge, authority or responsibility. I never held capacity as an owner, officer and/or agent of M&S Café Inc.
- 13. I have no such knowledge, authority or responsibility. I never held capacity as an owner, officer and/or agent of M&S Café Inc.
- 14. I have no such information. I never held capacity as an owner, officer and/or agent of M&S Café Inc.
- 15. I have no such information. I never held capacity as an owner, officer and/or agent of M&S Café Inc.
- 16. I have no such information. I never held capacity as an owner, officer and/or agent of M&S Café Inc.
- 17. A, I do not have information on the Plaintiff last day of work. B, any work-related communication took place by orally or by text, however, I did not have access to any. C, any work-related communication took place by orally or by text, however, I did not have access to any
- 18. According to my knowledge all the employees that I remember such as Nathasa, Lana, Maia and myself all left voluntarily.
- 19. A, I prepared all the answers and asked my friend to translate it. B, I prepared all the answers and asked my friend to translate it.

Defendant requests the Court to deny Plaintiff's claims, enter judgment in favor of Defendant, dismiss this suit with prejudice, and award Defendant its fees and costs, including attorney fees, reasonably incurred in connection with this matter.

Dated: July 27th, 2025

Defendant's Signature:

Print Name:

Zsuzsanna Tiringer

Address:

90 Seagate Court

City, State, Zip:

Staten Island, NY 10305

Telephone:

718-314-4123